

December 12, 2003

Stephen B. Alcott
Alcott Associates
44 Laurel Street
Somerville, Massachusetts 02143

Re: Witches Brook Water Company, D.T.E. 03-80

Dear Mr. Alcott:

Enclosed please find the Department of Telecommunications and Energy Settlement Intervention Staff's first set of information requests to Witches Brook Water Company in the above-captioned matter. Please submit responses on or before Monday, December 29, 2003.

Thank you for your prompt attention to this matter.

Sincerely,

Kevin F. Penders
Hearing Officer

Enc.

cc: Mary L. Cottrell, Secretary

WITCHES BROOK WATER COMPANY

D.T.E. 03-80

**FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY SETTLEMENT
INTERVENTION STAFF TO WITCHES BROOK WATER COMPANY**

INSTRUCTIONS

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") Settlement Intervention Staff ("SIS") submits to Witches Brook Water Company ("Witches Brook" or "Company") the following Information Requests:

1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if Witches Brook or its witnesses receive or generate additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If Witches Brook finds that any one of these requests is ambiguous, please notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. If a question refers to an information request of another party, please provide that response and answer with information that supplements the previous response.

REQUESTS

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| DTE-SIS 1-1 | Please provide a detailed organizational chart for the Company. |
| DTE-SIS 1-2 | Please provide audited balance sheets and income statements for the years 2000 through 2002 for Witches Brook Water Company. |
| DTE-SIS 1-3 | Please provide a copy of the service quality policy presently in effect for the Company. |
| DTE-SIS 1-4 | Refer to the Company's 2002 Annual Return to the Department at 202. Please explain the purpose of the adjustments presented in column (e) of this schedule. |
| DTE-SIS 1-5 | Refer to the Company's 2002 Annual Return to the Department at 206. Please explain the purpose of the credit of \$208,276 to the Company's depreciation reserve. Provide all workpapers, calculations, assumptions, etc., used to derive this adjustment. |
| DTE-SIS 1-6 | Refer to the Company's 2002 Annual Return to the Department at 206. Please explain the increase of \$43,000 made during the test year to Account 315 (Other Accrued Liabilities). Provide all workpapers, calculations, assumptions, etc. used to derive this adjustment. |

- DTE-SIS 1-7 Refer to the Company's prefiled testimony, workpaper WP-1, at 9. Please provide a detailed description of the job responsibilities, hours, and salaries for each of the employee categories that existed during the test year.
- DTE-SIS 1-8 Refer to the Company's prefiled testimony, workpaper WP-1, at 9. Please provide a detailed description of the job responsibilities, hours, and salaries for the second certified operator proposed by the Company. Has this position been filled by the Company?
- DTE-SIS 1-9 Refer to the Company's prefiled testimony, workpaper WP-1, at 9. Please provide a detailed description of the job responsibilities, hours, and salaries for the office assistant proposed by the Company. Has this position been filled by the Company?
- DTE-SIS 1-10 Refer to the Company's prefiled testimony, workpaper WP-1, at 9. Please provide an itemized breakdown of the following expenses included in Account 610-2 (General Office Supplies & Expense): (1) office expenses; and (2) data processing fees.
- DTE-SIS 1-11 Refer to the Company's prefiled testimony, workpaper WP-1, at 9. Please provide an itemized breakdown of the Company's continuing education expense included in Account 6110-11 (sic) (Miscellaneous General Expenses).
- DTE-SIS 1-12 Refer to the Company's prefiled testimony, workpaper WP-1, at 9. Please provide the citation to generally accepted accounting principles that requires the Company to charge the undepreciated balance associated with meter retirements to operating expenses.
- DTE-SIS 1-13 Refer to the September 12, 2003 public hearing transcript at 13, lines 3 through 5. Please provide the number of meters that have been actually purchased by the Company, and the number of meters actually installed to date.
- DTE-SIS 1-14 Refer to the September 12, 2003 public hearing transcript at 36, lines 10 through 12. Please explain the current status of the proposed agreement with Troupe Water Services.

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| DTE-SIS 1-15 | Refer to the September 12, 2003 public hearing transcript at 36, lines 10 through 12. Please provide a copy of the agreement, with all terms and conditions, between the Company and Troupe Water Services. |
| DTE-SIS 1-16 | Refer to the Company's prefiled testimony, workpaper WP-1, at 9. Please describe any modifications to this workpaper that would be required upon the execution of the Company's contract with Troupe Water Services. |
| DTE-SIS 1-17 | Refer the Company's prefiled testimony at Exh. 4. Please explain how the Company determined the estimated service lives for each of the plant account categories listed in this exhibit. |
| DTE-SIS 1-18 | Refer to the Company's prefiled testimony at Exh. 5, line 6. Please explain the basis for the 8.53 percent increase in property taxes between fiscal year 2003 and fiscal year 2004. |
| DTE-SIS 1-19 | Refer the Company's prefiled testimony at Exh. 5, line 9. Please explain the components and payroll levels from which the composite payroll tax rate of 10.65 percent has been derived. |
| DTE-SIS 1-20 | Refer to the Company's prefiled testimony at Exh. 1, at 1 (proposed volumetric charge of \$3.066 per 1000 gallons). Please explain in detail how the proposed increase of \$2.246 was determined, including all workpapers, calculations, assumptions, etc. |